Case 2:22-cv-01340-GMN-BNW Document 23 Filed 09/22/22 Page 1 of 3

- 1		
1	Leah A. Martin, Esq. Nevada Bar No. 7982	
2	Christian Delgado, Esq. Nevada Bar No. 15901	
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4	Las Vegas, Nevada 89106 Telephone: (702) 420-2733	
5	Facsimile: (702) 330-3235	
6	lmartin@leahmartinlv.com cdelgado@leahmartinlv.com Attorneys for Plaintiff	
7		NETDICT COUDT
8	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
9		
10	ESGS INC., a Nevada corporation,	Case No.: 2:22-cv-01340
11	Plaintiff,	PARTIES' STIPULATION FOR
12	VS.	EXTENDING TIME FOR PLAINTIFF TO FILE AN OPPOSITION TO
13	SEVEN MILE FOOD & BEVERAGE, LLC,	DEFENDANTS' MOTION TO DISMISS, EXTENDING TIME FOR
14	an Illinois limited liability company, DAVID PISOR, an individual; DOES I – X; and ROE	DEFENDANT TO FILE A REPLY TO PLAINTIFF'S OPPOSITION, AND TO
15	corporations $I - X$,	STAY DISCOVERY
16	Defendants.	
17		
18	The Parties jointly stipulate that Plainti	ff ESGS, Inc. shall have until September 30,
19	2022 to file its Opposition to Defendants' Motion to Dismiss. The Parties further stipulate that	
20	Defendants shall have until October 7, 2022 to file their Reply to Plaintiff's Opposition to	
21	Defendants' Motion to Dismiss.	
22	The Parties further jointly stipulate that all discovery shall be stayed until this Court	
23	J J 1	, ,
24		
25		
26		
27		
28		
-		

1	rules on Defendants' Motion to Dismiss.
2	IT IS SO STIPULATED.
3	DATED this 22nd day of September 2022.
4	/s/ Thomas F. Berndt
5	Howard J. Russell, Esq.
6	Marjan Hajimirzaee Esq. Weinberg, Wheeler, Hudgins,
7	Gunn & Dial, LLC
8	6385 South Rainbow Blvd., Suite 400 Las Vegas, NV 89118
	Las vegas, iv v 67116
9	Patrick M. Arenz (MN 0386537) (Admitted Pro Hac Vice)
10	PArenz@robinskaplan.com Thomas F. Berndt (MN 0389080)(Admitted Pro Hac Vice)
11	TBerndt@robinskaplan.com
12	ROBINS KAPLAN LLP 800 LaSalle Avenue, Suite 2800
13	Minneapolis, Minnesota 55402
14	Telephone: (612) 349-8500 Facsimile: (612) 339-4181
	Attorneys for Defendants Seven Mile Food & Beverage, LLC, and Mr. David Pisor
15	DATED this <u>22nd</u> day of September, 2022.
16	Diffill this <u>222</u> day of september, 2022.
17	/s/ Christian L. Delgado
18	LEAH MARTIN LAW
19	Leah Martin, Esq. Nevada Bar No. 7982
20	Christian Delgado, Esq.
21	Nevada Bar No. 601 South Rancho Drive, Suite C-26
22	Las Vegas, Nevada 89106
23	Attorneys for Plaintiff
24	IT IS SO ORDERED.
25	Dated this 22 day of Soutomber 2022
26	Dated this 22 day of September, 2022
27	
28	Want -
20	Gloria M. Navarro, District Judge
	UNITED STATES DISTRICT COURT



Gwen Phillip <gphillip@leahmartinlv.com>

Fwd: [EXTERNAL] Re: ESGS v. Pisor: Draft Joint Status Report

Gwen Phillip <gphillip@leahmartinlv.com> Draft

Thu, Sep 22, 2022 at 2:29 PM

----- Forwarded message -----

From: Berndt, Thomas F. <TBerndt@robinskaplan.com>

Date: Thu. Sep 22, 2022 at 2:02 PM

Subject: RE: [EXTERNAL] Re: ESGS v. Pisor: Draft Joint Status Report

To: Erik Simpson <esimpson@leahmartinlv.com>, Christian Delgado <cdelgado@leahmartinlv.com>

Ramalingam, Navin <NRamalingam@robinskaplan.com>, Russell, Howard <HRussell@wwhgd.com>

Thanks, Erik! Looks good to us. Feel free to add our e-signature and file.

From: Erik Simpson <esimpson@leahmartinlv.com> Sent: Thursday, September 22, 2022 3:48 PM

To: Berndt, Thomas F. <TBerndt@RobinsKaplan.com>; Christian Delgado <cdelgado@leahmartinlv.com>

Cc: Kevin Hejmanowski < khejmanowski@leahmartinlv.com>

Subject: Re: [EXTERNAL] Re: ESGS v. Pisor: Draft Joint Status Report

Attached please find a proposed stipulation. Please let me know if there is anything you would like revised or if it can be submitted. Thanks.

On Fri, Sep 16, 2022 at 12:05 PM Berndt, Thomas F. <TBerndt@robinskaplan.com> wrote:

Christian, Leah, Kevin, and Erik,

We need to file the Joint Status report shortly. Can one of you please authorize us to file this revised version? If we don't hear from you, we'll have to go ahead and file by end of day.

Thanks!

Tom

From: Berndt, Thomas F.

Sent: Friday, September 16, 2022 10:51 AM

To: Christian Delgado <cdelgado@leahmartinlv.com>; Ramalingam, Navin <NRamalingam@RobinsKaplan.com> Cc: Leah Martin martin@leahmartinlv.com; Kevin Hejmanowski khejmanowski@leahmartinlv.com; Erik Simpson

<esimpson@leahmartinlv.com>; Arenz, Patrick M. <PArenz@RobinsKaplan.com>

Subject: RE: [EXTERNAL] Re: ESGS v. Pisor: Draft Joint Status Report

Importance: High